



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

June 18, 2025

**BY ECF**

Hon. Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2260  
New York, New York 10007

**Re: *New York Times Co. v. U.S. Department of Justice*,  
25 Civ. 562 (GHW)**

Dear Judge Woods:

We write respectfully on behalf of defendant the United States Department of Justice (“DOJ”) in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), to make two requests.

First, we respectfully seek an adjustment of the current briefing schedule related to DOJ’s pending motion to dismiss (ECF Nos. 23-25). Under the existing schedule, Plaintiff New York Times Co. (the “Times”) is scheduled to file its opposition to DOJ’s motion on June 27, 2025, and DOJ is scheduled to file its reply on July 11, 2025. One of the attorneys representing DOJ, AUSA Sarah Normand, is leaving the U.S. Attorney’s Office later this month. The other DOJ attorney, AUSA Dana Walsh Kumar, will be traveling internationally during the period currently scheduled for DOJ’s reply brief, and will not be returning until July 5. Accordingly, we respectfully request that the deadline for the Times’ opposition be extended from June 27, 2025 to July 9, 2025, and that the deadline for DOJ’s reply be extended from July 11, 2025, to July 23, 2025. We have conferred with counsel for the Times and the Times consents to this revised schedule. This is DOJ’s first request for an adjustment of the briefing schedule.

Second, we respectfully request that AUSA Sarah Normand be removed from the docket in this action. As noted, AUSA Dana Walsh Kumar will continue to represent DOJ in this matter.

We thank the Court for its consideration of these requests.

Respectfully,

JAY CLAYTON  
United States Attorney

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